

REMARKS

In response to the above-identified final Office Action, Applicants have amended the specification and have amended claims 5-7, 16-18, and 26-28. Support for the amendments to the claims is found in the above-identified application at page 9, lines 16-17, page 10, lines 3-21, page 11, lines 1-11, and page 14, lines 13-16. Accordingly, no new matter has been entered by way of these amendments. In view of the above amendments and the following remarks, Applicants hereby request further examination and reconsideration of the application, and allowance of claims 5-35.

The Office has objected to the specification asserting that “Appletalk” is not properly cited as a trademark/trade name. In response, Applicants have amended the specification to identify each occurrence of “Appletalk” as a trademark as shown above. The Office has also objected to the specification asserting that the continuity and related applications data on page 1 of the specification should be updated. In response, Applicants have amended the specification to update the continuity data and have deleted the references to related applications as shown above. No new matter has been added. Since the related applications are not being relied upon for domestic priority under §120, they are not required to be listed in the specification. Furthermore, these related applications have been brought to the Office’s attention by way of an Information Disclosure Statement filed on June 7, 2002, which discloses each application. In view of the foregoing amendments and remarks, the Office is respectfully requested to withdraw these objections to the specification.

The Office requires Applicants to provide a statement that no new matter was submitted with regard to the amendments made to the specification in the amendment filed on October 1, 2002. Applicants respectfully note that such a statement was provided in the Amendment submitted on April 21, 2003. For the Office’s convenience, however, Applicants hereby reaffirm that the amendments to the specification in the amendment filed on October 1, 2002 were typographical in nature and do not introduce any new matter. In view of the foregoing remarks, the Office is respectfully requested to withdraw this objection and acknowledge entry of the amendments to the specification in the amendment filed on October 1, 2002.

The Office has rejected claims 5-35 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,301,462 to Freeman et al. ("Freeman") in view of U.S. Patent No. 6,195,687 to Greaves et al. ("Greaves"). In particular, the Office asserts that Freeman discloses a client communication system that receives control data from at least one of the plurality of clients, the control data associated with tasks to be performed for a training exercise (col. 2, line 63 through col. 3, line 3); a device management system that provides low-level commands (i.e., assembly or machine language) for the electronic training devices (e.g., online modules, chat sessions, conferences, course content, TV WEB browsers, WEB access devices, workstations, etc.) based on the control data from the at least one client to implement functions to change a configuration of the electronic devices (col. 5, lines 42-61; col. 6, lines 25-34; and col. 9, lines 19-24); and a control system (i.e., server) configured to access a first set of two or more of the electronic training devices based upon one or more requirements of the training exercise, the control system manipulating the first set of the electronic training devices according to the control data using the low-level commands provided by the device management system to perform portions of the training exercise (col. 5, lines 42-61 and col. 6, lines 25-34).

The Office concedes that Freeman does not disclose wherein the changed configuration (e.g., slave node device used as a teaching aid during a classroom session or a test administering element) results in manipulating fundamental operations of the electronic training devices that the electronic training devices are originally configured to perform (i.e., state of control predefined (by the system)). The Office asserts, however, that Greaves teaches wherein the changed configuration results in manipulating fundamental operations of the electronic training devices that the electronic training devices are originally configured to perform (col. 2, lines 15-35 and col. 3, lines 22-35) and as a result, it would have been obvious to one of ordinary skill in the art at the time of the invention to incorporate the teachings from Greaves into Freeman to enable custom configuration of slave devices for a particular teaching environment. In response, Applicants have amended claims 5, 16, and 26 as shown herein and submit the following remarks.

Neither Freeman nor Greaves, alone or in combination, suggest or disclose, “control data comprising at least one task to be performed by the electronic training devices, wherein the at least one task comprises execution of at least a portion of a training exercise ... a device management system that provides low-level commands ... based on the control data to implement functions that change a configuration of the electronic training devices, wherein the changed configuration results in manipulating fundamental operations of the electronic training devices that the training electronic training devices are originally configured to perform,” as recited in claim 5, or “receiving control data comprising at least one task to be performed by the electronic training devices, wherein the at least one task comprises execution of at least a portion of a training exercise ... providing low-level commands for the electronic training devices based on the control data to implement functions that change a configuration of the electronic training devices, wherein the changed configuration results in manipulating fundamental operations of the electronic training devices that the electronic training devices are originally configured to perform,” as recited in claims 16 and 26.

As mentioned above, the Office concedes that Freeman does not disclose wherein the changed configuration (e.g., slave node device used as a teaching aid during a classroom session or a test administering element) results in manipulating fundamental operations of the electronic training devices that the electronic training devices are originally configured to perform (i.e., state of control predefined (by the system)). Contrary to the Office’s assertions, however, Greaves does not disclose or suggest control data comprising at least one task to be performed by electronic training devices where the at least one task comprises execution of at least a portion of a training exercise and providing low-level commands based on the control data to implement functions that change a configuration of the electronic training devices where the changed configuration results in manipulating fundamental operations of the electronic training devices that the training electronic training devices are originally configured to perform. ✓

Applicants respectfully direct the Office’s attention to Greaves at FIG. 1, col. 3, lines 15-50, which discloses an assignment means 18 that assigns slave node devices 14 to master node devices 12. The slave node devices 14 are assigned to particular master node devices 12 based upon time/locale control criteria to perform various functions. Id. For

example, the slave node device 14 could be used interactively as a teaching aid during a classroom session. Id. The time/locale control criteria consists of a preselected period of time, such as a class period, or a preselected period of time within a preselected geographic region, such as a classroom, for example. Id. However, the time/locale control criteria is not a task that is to be performed by the slave node device 14 to execute at least a portion of a training exercise. Instead, the time/locale control criteria is simply used to determine which slave node devices 14 are assigned to particular master node devices 12. ✓

Applicants also direct the Office's attention to col. 3, lines 58-67 and FIG. 1 in Greaves, which disclose a configuration master node device 13 that can control and configure the master node devices 12. The configuration master node device 13 can also control the slave node devices 14 when the configuration master node device 13 is directly coupled to the slave devices 14. Id. As discussed above, the time/locale control criteria is not a task that is performed by the slave node device 14 to execute at least a portion of a training exercise. Thus, the configuration master node device 13 does not control or configure the master node devices 12 or the slave devices 14 to control fundamental operations of the master node devices 12 or the slave devices 14 based on the time/locale control criteria comprising tasks to be performed by the master node devices 12 or the slave devices 14 where the tasks comprise execution of at least a portion of the classroom session as claimed.

The present invention enables users to actually control low-level functions of devices to actually change the devices' configurations during training exercises, as disclosed at page 10, lines 3-21 through page 11, line 11 in the above-identified application. Further, the system can change the configuration of the user devices 314 depending on the user's actions during a training exercise whereas other systems, such as Greaves and Freeman, simply have clients that interact with servers only in the manner the servers are programmed to behave. For example, and referring to page 11, lines 5-11 in the above-identified application, a Frame Relay switch may be used to implement a wide area network connection between user devices. Another example is provided at page 14, lines 13-16 in the above-identified application, where the user devices may comprise mechanical shuttles that can move a beaker to different locations, for example, during a training exercise, such as a chemistry lab. Referring now to page 9, lines 16-17 in the above-identified application,

allowing devices to be controlled for assignments enables embodiments of the invention to replicate real-world scenarios that other systems, such as Freeman, simply cannot.

In view of the foregoing amendments and remarks, the Office is respectfully requested to reconsider and withdraw the rejections of claims 5, 16 and 26. Since claims 6-15 depend from and contain the limitations of claim 5, claims 17-25 depend from and contain the limitations of claim 16, and claims 27-35 depend from and contain the limitations of claim 26, they are patentable in the same manner as claims 5, 16 and 26.

Additionally, neither Freeman nor Greaves, alone or in combination, disclose or suggest, "a resource control system ... interpreting the overhead information to control at least one of a first type and a second type of electronic training devices," as recited in claim 7, or "interpreting the overhead information to control at least one of a first type and a second type of electronic training devices," as recited in claims 18 and 28. If the servers 231-244 in the Freeman reference are interpreted as the first and second types of electronic training devices as claimed, then Applicants direct the Office's attention to col. 5, lines 10-22 in Freeman, which discloses the overhead information being used to identify the host 250. However, the overhead information is not interpreted by the host 250 for controlling systems 231-244. A local terminal server 225 segments data received from clients 201-203 into payload segments and adds the overhead information to the payload segments that are sent to the host 250. The overhead information includes a packet header that further includes a destination address of the host 250, but does not include information for controlling the different types of systems 231-244.

Furthermore, while the systems 231-244 (e.g., e-mail server 241, chat server 242) perform different functions, the systems 231-244 are all the same types of devices. If the clients 201-203 in Freeman are interpreted as the first and second types of electronic training devices as claimed, then Applicants direct the Office's attention to col. 5, lines 22-30, which discloses the host 250 using the overhead information to identify specific clients 201-203. However, the overhead information is not interpreted by the host 250 for controlling clients 201-203. The host 250 segments data to be sent to the clients 201-203 into payload segments and adds overhead information to the payload segments. Here, the overhead information includes a packet header that further includes a destination address identifying the clients 201-203.


Similarly, Greaves does not disclose or suggest interpreting overhead information to control a first type and a second type of electronic training devices. Referring back to Greaves at col. 3, lines 58-67 and FIG. 1, the configuration master node device 13 can control and configure the master node devices 12 and the slave node devices 14. But, as mentioned above, the time/locale control criteria are not the tasks that are to be performed by the slave node device 14 during a classroom session. Thus, the configuration master node device 13 does not control or configure the master node devices 12 or the slave devices 14 to manipulate fundamental operations of the master node devices 12 or the slave devices 14 based on the time/locale control criteria comprising tasks to be performed by the master node devices 12 or the slave devices 14 for a classroom session as claimed, let alone interpret overhead information to control a first type and a second type of master node devices 12 or the slave devices 14. ✓

Applicants now direct the Office's attention to FIG. 23 and page 29, lines 15-17, in the above-identified application. The present invention employs a common set of instructions that are communicated to and understood by the resource control module 2310 for controlling a number of devices 2318. Referring now to page 31, lines 1-13, in the above-identified application, an operations module 2322 calls the appropriate script for each device based upon the instruction it receives by consulting a database 2344. Device specific details are encapsulated within the scripts. As stated at page 31, lines 1-2 in the application, the resource control module 2310 also enables new devices to be added without requiring major modifications. As a result, the present invention offers a scaleable and configurable mechanism for providing remote access and control of computing resources, and facilitates sharing one set of assets among many users in a timely manner with no manual intervention, as disclosed at page 27, lines 7-8 and lines 15-17 in this application. As such, claims 7, 18 and 28 are patentable over the cited art for this additional reason.

In view of all of the foregoing, it is submitted that this case is in condition for allowance and such allowance is earnestly solicited. In the event that there are any outstanding matters remaining in the above-identified application, the Office is invited to contact the undersigned to discuss this application.

Respectfully submitted,

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